

FILED  
IN OPEN COURT  
DEC 16 2008  
CLERK, U.S. DISTRICT COURT  
NORFOLK, VA

DECEMBER 2008- At Norfolk, Virginia

COUNT ONE

THE GRAND JURY CHARGES THAT:

Between the dates of in or about May 13, 2008, and in or about May 17, 2008, in the Eastern District of Virginia and elsewhere, the defendant, TERROL SPRUELL did unlawfully, knowingly and intentionally conspire together with other persons known and unknown to the grand jury to commit the following offenses against the United States:

1. To knowingly, intentionally and unlawfully possess with intent to distribute more than five kilograms of cocaine, a schedule II narcotic controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii).

2. To knowingly, intentionally and unlawfully distribute more than five kilograms of cocaine a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii).

(All in violation of Title 21, United States Code, Sections 846, and 841(a)(1)).

### FORFEITURE ALLEGATION

THE GRAND JURY FURTHER CHARGES THAT:

A. The defendant, TERROL SPRUELL if convicted of the violations alleged in Count One of the indictment, namely conspiracy to possess with intent to distribute narcotics, shall forfeit to the United States:

1. Any and all property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as the result of such violation; and

2. Any of the defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation.

3. If any property that is subject to forfeiture above, (a) cannot be located upon the exercise of due diligence, (b) has been transferred to, sold to, or deposited with a third person, (c) has been placed beyond the jurisdiction of the Court, (d) has been substantially diminished in value, or (e) has been commingled with other property that cannot be subdivided without difficulty; it is the intent of the United States to seek forfeiture of any other property of the defendant, as subject to forfeiture under Title 21, United States Code, Section 853(p).

(In violation of Title 21, United States Code, Section 853)

UNITED STATES V. TERROL SPRUELL, 4:08CR

A TRUE BILL

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